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November 18, 2009

Office of General Counsel
Federal Election Commission
999 E Street NW
Washington, DC 20463

RE: MUR6222
Complainant: Stacey Lynn Cargill
Respondent and Our Client: West Hill United Methodist Church

Dear Sirs:

On or about October 31, 2009, there was received by the West Hill United Methodist Church the Complaint of Ms. Cargill together with other documentation and a cover letter in the above referenced matter. A thorough examination of all documentation and materials at the church have been done and there are enclosed statements and affidavits from officers and employees of the church in relation to those matters.

In addition, not only has there been a thorough review of all documentation, there has also been a review and an audit of all checking accounts and all other accounts at the church for the relevant time period. It should also be noted that Pastor Morris Hurd has not been interviewed in relation to these matters as it was felt that as a separate Respondent he would make his own response to the allegations. Therefore, any responses herein would not include any issues relating to what Pastor Hurd may or may not know. Also, it is understood that Pastor Hurd is represented by separate legal counsel. However, in relation to all other matters, the following can be said:

1. No individual at the church whether an officer, director or parishioner, has any knowledge of any of the allegations as identified in Ms. Cargill's Complaint.
2. All accounts of any nature have been thoroughly audited for 2008, and no

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funds have passed through any account at the church which would have had anything to do with the Iowa Christian Alliance or be associated therewith and there exists no funds that would have passed through any accounts which were not used directly for ministerial and benevolence purposes, for the operation of the church or to directly assist the parishioners of the church.

3. A thorough review and audit has been completed of all assets of the church and there have not been found any documents of any nature, may they be electronic or hard copy, by which West Hill United Methodist Church thanked any donor for any charitable contribution, provided a receipt or 1099 to any donor concerning any of the alleged ICA donations. Frankly put, a thorough review has been made of any source of documentation and there has been no known tax receipts, tax reports or other letters or communications or other documents of any nature that would be considered to respond to or be a part of any of the allegations. They simply do not exist in the framework of any assets or documentation of the church.

4. Until reception of the Complaint and other documentation from the Federal Election Commission, no one at West Hill United Methodist Church had any prior knowledge of the Iowa Christian Alliance (with the exception provided below), nor any of the individuals mentioned therein (with the exception of Pastor Morris Hurd) and had no participation with nor any involvement whatsoever with the Iowa Christian Alliance. Again, excluded herefrom is any issues involving Pastor Morris Hurd as any involvement he may have had with the Iowa Christian Alliance as any political activism issues were unknown to any parishioners, members, staff or other personnel involved with West Hill United Methodist Church. The sole exception is at the October 12, 2009 Administrative Counsel meeting of West Hill United Methodist Church. Pastor Hurd requested having an ICA sponsored non-partisan caucus training event on January 11, 2010, at the West Hill United Methodist Church. That event is not being held at the West Hill United Methodist Church but at the Burlington Public Library. Also, Kathy Moore was aware that Pastor Hurd was a member of the ICA.

5. The West Hill United Methodist Church staff and parishioners have diligently reviewed any and all documentation or sources of documents and have been unable to locate anything that would support any of the allegations. If such would have existed, the same would have been immediately tendered to make sure that these issues could be resolved equitably and immediately.

Attached herewith are Affidavits of Michael L. Zaiser, Chairman of the Board of Directors of the church; Kathy Moore, who is the Secretary/Treasurer of West Hill United Methodist Church; as well as Diane Lee and Alice Hart who were on the Finance Committee and were responsible for handling, depositing and accounting for all funds that would have come into the church and from Harold Swanson who has internally audited the books and records of the church for 36 years and re-audited the books and records for 2008.

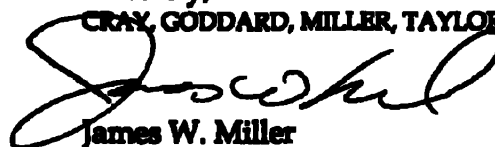
Each of their statements is self-explanatory, but also include confirmation of lack of knowledge or information in relating to any of the allegations of Ms. Cargill. If at any time further information is found which would be relevant to any allegations of Ms. Cargill or from other sources for which further response would be required or be helpful to the Federal Election Commission, the West Hill United Methodist Church will supplement to make sure that any questions are thoroughly answered and we can move forward in resolution of all the allegations.

On November 13, 2009, there was received by the undersigned two supplements to Ms. Cargill's complaint. It does not appear that any of the allegations identified therein altered to any degree the general nature of the original allegations. It is interesting, however, that in the shorter of the two most recent supplements to the Complaint, Ms. Cargill is arguing that somehow the information in some articles from a couple of newspapers somehow "confirm" the financial contributions that she had previously claimed existed. Upon reviewing of those articles, it appears that almost all of the information in those articles are drawn from the allegations that Ms. Cargill has put in her original Complaint. It is interesting that Ms. Cargill now wants to argue that Articles created off her original Complaint somehow support her original Complaint when in reality there are simply reiterating what she had previously stated. However, if in the investigation by the Federal Election Commission, there is found some trail of evidence that would show that there has ever been any funds received by West Hill United Methodist Church and processed to the Iowa Christian Alliance, the specific facts, check numbers, dates and other relevant information will be used by the church to further trace any and all such funds. It is hard to believe that any such exists based upon the Affidavits attached and the information known to the church as the church officers have diligently worked through all books and records and have found no documentation that would support to any degree any of the allegations of Ms. Cargill or the two supplemental Complaints. It would appear that many, if not all, of the allegations of Ms. Cargill are based upon hearsay and unsubstantiated and supported believes by Ms. Cargill.

West Hill United Methodist Church has always worked diligently to maintain the highest integrity and honesty with any reporting agency and the allegations are very disconcerting to the membership of the church and we would wish and will seek a thorough and rapid resolution of these issues. Thank you greatly for your time and attention to this matter and we look forward to your response.

Sincerely,

CRAY, GODDARD, MILLER, TAYLOR & CHELF, L.L.P.



James W. Miller

JWM:cm

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